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December 7, 2023

VIA ECF

Honorable Claire C. Cecchi
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

Re: DOWC Provider Services, LLC, et al. v. U.S. Auto Sales, Inc., et al.
Civil Action No.: 2:23-cv-03947-CCC-JSA
Motion to Dismiss (ECF No. 14) returnable December 18, 2023 and
Motion to Stay (ECF No. 22) returnable December 18, 2023

Dear Judge Cecchi:

Defendants Westlake Services, LLC d/b/a Westlake Financial ("Westlake") and Westlake Portfolio Management, LLC ("WPM") (collectively, "Defendants") in the above-referenced action respectfully request an adjournment of the return date of Defendants' pending Motion to Dismiss and Motion to Stay Proceedings from December 18, 2023 to January 2, 2024, and an extension of time for Defendants to file reply briefs with respect to both motions.

Defendants' Motion to Dismiss was initially filed on October 11, 2023, and Defendants' Motion to Stay Proceedings was filed on November 10, 2023. Plaintiffs DOWC Provider Services, LLC, et al. ("Plaintiffs") requested an adjournment of the return date for Defendants' Motion to Dismiss on October 20, 2023. The parties further requested an adjournment of the return date for Defendants' Motion to Dismiss on November 15, 2023. Plaintiff thereafter filed a response to Defendants' Motion to Dismiss and Motion to Stay on December 4, 2023 (ECF No. 31). Defendants' deadline to reply to Plaintiffs' response is currently set for December 11, 2023.

With the Court's approval, the new return date would make Defendants' reply due on December 26, 2023. Defendants have consulted with Plaintiffs' counsel, who consents to the requested adjournment and extension. Defendants respectfully request that the Court "so order" the requested adjournment and extension.

Thank you for your consideration of this motion.

Respectfully submitted,

/s/ A. Eli Kaplan
A. Eli Kaplan

Counsel of Record (via ECF)